

## FEMA REGION V

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### *short notes on planning #13*

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#### REPETITIVE LOSSES

Repetitive loss structure is a term that is usually associated with the National Flood Insurance Program (NFIP). This is a structure, covered by a contract of flood insurance under the NFIP, that has suffered flood damage on two or more occasions over a 10-year period ending on the date when a second claim is made, in which the cost to repair the flood damage, on average, equals or exceeds 25% of the market-value of the structure at the time of each flood loss event. For the Community Rating System (CRS) of the NFIP, a repetitive loss property is any property, which the NFIP has paid two or more flood claims of \$1,000 or more in any, given 10-year period since 1978. A repetitive loss structure is important to the NFIP, since structures that flood frequently put a strain on the flood insurance fund. It should also be important to a community because residents' lives are disrupted and may be threatened by the continual flooding.

A Community that prepares a mitigation plan should include a map showing the general location of all repetitive loss structures and address ways to reduce or eliminate future damages. The community should also identify whether the structures uses are residential, commercial or industrial, since mitigation actions are frequently dependant on the use of the structure. Information regarding whether a community has any repetitive loss structures may be obtained from the State NFIP Coordinator's Office or the FEMA Regional Office.

Common sources of funding which can be used to mitigate repetitive loss structures are Flood Mitigation Assistance Program (FMA) funds, Hazard Mitigation Grant Program (HMGP) funds or Pre-Disaster Mitigation Program (PDM) funds. Increased Cost of Compliance (ICC) funds for a substantially damaged structure covered by flood insurance can also be used to mitigate repetitive loss structures.

Since actual losses are not limited to those structures that are in the NFIP or those that are at risk to only flood damage, communities are encouraged to identify any structure that is susceptible to the hazards included in the plan and may have been repeatedly damaged. This helps to ensure that the community becomes disaster resistant. Communities may determine the location of repetitive loss structures by reviewing the records of their local emergency responders, by relying on visual records after a disaster, or by surveys of the community.

There are concerns with including information on repetitive loss structures in the mitigation plan because of “Privacy Act” issues. As long as the portion of the plan that goes out to the public only includes a map showing the general location of the hazard and the structure, this should not be an issue. The map should be specific enough to show that the structure is in the hazard area, but should not be specific enough to identify the exact structure. Any accompanying information, such as address and date of loss that will be useful to the planning staff, the state emergency management agency and FEMA, may be requested separately.

## **EXAMPLE APPENDIX**

While preparing the Flood Mitigation Plan for the City of Anytown, the City Planner contacted the State NFIP Coordinating Office to see if there were any repetitive loss structures in the community. Shortly thereafter, he received a list of 15 structures. The list included the address of the structure, the date of losses, and the amount of each loss. After reviewing the list, he determined that while 6 of the structures had an Anytown mailing address, they were located outside of the municipal limits.

He notified that State and FEMA regarding the addresses of the 6 structures outside of Anytown and included the rest of the data, including the losses, with a generalized chart to be included in the plan. The chart indicated all structures within the community that were at risk. Below is an example of the chart:

### **STRUCTURES AT RISK**

<b>STRUCTURES BY USE</b>	<b>REPETITIVE LOSS</b>	<b>DATE OF LOSSES</b>
4 Residential Structures	\$350,000	6/30/90 8/12/95
2 Commercial Structures	\$200,000	8/12/95

In the narrative the planner noted that two of the 4 residential structures had been mitigated previously by moving the structures out of the floodplain.